

RHEINMETALL 4iG DIGITAL SERVICES LLC.

RULES OF PROCEDURE FOR THE ETHICS COMMITTEE

DEFINITIONS

Concept	Explanation of term
4iG Group	4iG Plc and its directly or indirectly controlled subsidiaries.
Whistleblower	A person who reports a suspected infringement to us.
Person concerned by a report	A person whose conduct or omission has given rise to the report or who has material information about the matter reported
Report	The provision of information about a suspected or likely breach to the person designated to investigate it (Compliance Officer).
Group Internal Audit	Group Internal Audit is an independent, objective function that adds value to and improves the quality of the organisation's operations. It uses a methodical and controlled process to assess and improve the effectiveness of risk management, control and governance processes, thereby helping to achieve organisational goals. For the purposes of this Policy, Group Internal Audit is the independent and impartial body that is empowered to investigate allegations of misconduct and take the necessary action to remedy the misconduct in the event of a conflict of interest in the Compliance function.
Group Compliance / Compliance	The independent and impartial function responsible for improving the compliance of R4 with laws, regulations, standards, corporate rules and ethical and moral principles. Compliance is responsible for the operation of the whistleblowing system under this Policy.
Group Compliance Manager	The person responsible for the professional management of the Compliance functions at each member company within the 4iG Group.
Compliance Officer	Within the Compliance function, the person responsible for compliance activities and, with regard to this Policy, for the investigation of whistleblowing.
Legitimate report	A legitimate report is one that has been made through one of the channels provided under the Ethics and Compliance Line as defined in section 4.2 of this Policy.
Anonymous report	A report where the identity of the whistleblower cannot be identified, either directly or indirectly, on the basis of the information provided.
Breach of standards	An act or omission that is unlawful or alleged to be unlawful, that may violate or is alleged to violate any applicable law (including EU standards), as well as an act or omission that is alleged to violate the requirements and fundamental ethical standards of the R4 Code of Ethics and Business Conduct, the R4 Business Partner Code of Ethics, and R4's policies, and other alleged misconduct relating to internal regulations.
Whistleblowing Act	Act XXV of 2023 on complaints, reports in the public interest, and rules relating to the whistleblowing
R4	Rheinmetall 4iG Digital Services LLC.

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1. SCOPE AND RESPONSIBILITIES

1.1 THE PURPOSE OF THESE RULES OF PROCEDURE IS

An integral part of the ethical conduct of Rheinmetall 4iG Digital Services LLC, (hereinafter referred to as "**R4**", "**our Company**" or "**we**") is the adherence to our Company's ethical values and standards by our employees and business partners.

In order to achieve this goal, R4 has decided to establish an Ethics Committee (the "**Ethics Committee**") whose primary task is to ensure that R4 operates in compliance with the law and the Group's ethical commitment, in order to maintain the trust of R4's employees, customers, owners, business partners and other stakeholders and to safeguard the reputation of our Company.

R4 has established the following procedures (collectively, the "**Ethics Procedures**") primarily to carry out the Ethics Committee's responsibilities:

1. a procedure to provide statements (hereinafter referred to as the "**Consultative Procedure**") on the matters set out in the R4 Group Code of Ethics and Business Conduct, the Business Partner Code of Ethics (the Code of Ethics and Business Conduct and the Business Partner Code of Ethics, collectively referred to as the "**Code of Ethics**") and the related internal regulations governing the ethical conduct of R4's business partners, which are adopted by the business partners;
2. a procedure for the investigation of the reports made in connection with violations of the provisions of Hungarian and EU law, the **Code of Ethics** and related internal rules, for holding the violators accountable, for remedying the situation, for restoring ethical conduct and for taking any further action required (e.g. holding the employee accountable or initiating other legal proceedings) (hereinafter referred to as the "**whistleblowing procedure**").

The purpose of these Rules of Procedure (hereinafter referred to as "**the Policy**" or "**the Rules**") is to regulate the organisation, functioning and procedures of the Ethics Committee.

1.2 RESPONSIBILITY

The Chief of the Ethics Committee is responsible for ensuring that the rules set out in this Rules of Procedure are respected and enforced.

1.3 SCOPE

1.3.1 Personal scope

This Policy applies to R4 and all of its employees, senior executives (together referred to as "**employees**").

1.3.2 Temporal scope

This Policy shall enter into force upon their adoption and promulgation by the Managing Director.

1.3.3 Material scope

The scope of this Policy shall include all policies adopted by R4, in particular the Code of Ethics and Business Conduct, the Business Partner Code of Ethics and all internal policies.

2. PERSONS AND ORGANISATIONS INVOLVED IN THE CONDUCT OF ETHICS PROCEDURES

The Ethics Committee and the Compliance Officer are involved in the conduct of the Ethics procedures. The Compliance Officer designated for R4 acts under the professional direction of the Group Compliance Manager.

2.1 THE ETHICS COMMITTEE

2.1.1 Organisation of the Ethics Committee

The Ethics Committee is composed of seven permanent members. The members of the Ethics Committee elect a Chief from among themselves on an annual basis. An external expert may be invited to participate in an advisory capacity, at the discretion of the Ethics Committee.

The permanent members of the Ethics Committee are the following persons:

- 2 (two) persons appointed by the Group General Business Deputy CEO, who are employees of the member company of the Telecommunications Division;
- 1 (one) employee appointed by the Deputy Chief Information Officer;
- 1 (one) employee employed by a foreign subsidiary of 4iG Plc;
- Group HR Director;
- Group Legal Director;
- Group Quality Management Director.

The Compliance Officer shall arrange for the appointment of the members of the Ethics Committee.

In the event of any member of the Ethics Committee being prevented from attending, he/she shall be entitled to appoint another person from among the employees of the 4iG Group to replace him/her until the end of his/her period of incapacity. The employee appointed to replace a member of the Ethics Committee shall be entitled to participate fully in the work of the Ethics Committee. The person appointed by the Chief of the Ethics Committee to replace him/her shall not be entitled to exercise the rights of the Chief of the Ethics Committee arising from his/her office. In the event of the Chief of the Ethics Committee being prevented from exercising the rights and duties arising from his/her office as Chief, the exercise of those rights and duties shall be the responsibility of a permanent member appointed by the Chief of the Ethics Committee on an ad hoc basis.

2.1.2 The Chief of the Ethics Committee

The Chief of the Ethics Committee shall in particular be responsible for the following tasks:

1. representing R4's ethical commitment and ethical business culture in external and internal communications;
2. to report on the activities of the Ethics Committee to 4iG Plc's Board of Directors, if necessary, but at least once a year
3. to convene the Ethics Committee;
4. conducting the meetings and voting of the Ethics Committee;
5. provide statements taken by the Ethics Committee in external and internal communications.

2.1.3 Tasks of the Ethics Committee

The Ethics Committee shall in particular be responsible for the following tasks:

1. in the event of violations of the provisions of Hungarian and European Union law, the Code of Ethics and related internal regulations, to initiate the prosecution of the violators, to remedy the situation, to restore ethical conduct and to take any further action required (e.g. prosecution of the employee or other legal proceedings);
2. discussing issues raised in relation to the provisions of the Codes of Conduct and related internal rules and provide statements in response;
3. investigating ethical and compliance issues that do not constitute ethical misconduct and provide statements on them;
4. taking decisions on the dissemination of an ethical culture and the enforcement of ethical standards of conduct within R4;
5. participating in the conduct of ethics procedures.

2.1.4 Procedure for providing of the Ethics Committee's statements

The Ethics Committee may provide its statements in person, in a meeting or without a meeting.

Providing its statements with a meeting

The Ethics Committee shall meet as necessary.

The Chief of the Ethics Committee shall convene the Ethics Committee without delay or initiate the adoption of a statement of the Ethics Committee without a meeting in the following cases:

- if, in the context of the whistleblowing procedure, the Compliance Officer has made available to the Chief of the Ethics Committee a report (complaint) of a violation of the law, the Code of Ethics or the internal regulations, as provided for in Chapter 4.1.6 of these Rules;
- in the event that an ethical issue arises in the context of R4's operations that is not covered by the Code of Ethics or internal regulations, but which resolving could have a significant impact on R4's judgment or business decisions.

The permanent members of the Ethics Committee and the designated Compliance Officer are entitled to attend the Ethics Committee meeting and express their views on the matters discussed. The Compliance Officer has no voting rights.

Meetings of the Ethics Committee may be convened by invitation by the Chief of the Ethics Committee or, in the case provided for in point 4.1.2 of these Rules, by the Compliance Officer. At least two days must elapse between the date of dispatch of the invitation and the date of the meeting of the Ethics Committee. In cases of particular justification and urgency, an extraordinary meeting may be convened within 24 hours.

The invitation shall include at least:

- an indication of the time and place of the meeting,
- the agenda of the meeting, and
- - in the case of a whistleblowing procedure - a draft statement prepared by the Compliance Officer and approved by the Group Compliance Manager to be developed at the meeting.

The agenda shall be set out in the invitation in sufficient detail to enable the members of the Ethics Committee to provide their statements on the issues to be discussed.

Any member of the Ethics Committee shall be entitled to propose additions to the agenda. An item placed on the agenda by a member of the Ethics Committee shall be deemed to have been placed on the agenda if he/she communicates his/her proposal to the Chief of the Ethics Committee at least one day before the meeting of the Ethics Committee. At a meeting of the Ethics Committee, a statement may be adopted only on the item duly placed on the agenda, unless all those entitled to attend are present and unanimously agree to discuss an item not on the agenda.

In the event that a meeting of the Ethics Committee has not been duly convened, the meeting may be held if all those entitled to attend are present and unanimously agree to hold the meeting.

A quorum shall exist at a meeting of the Ethics Committee if more than half of its members are present. The members of the Ethics Committee may participate in meetings of the Ethics Committee by telephone or video conference. However, this fact shall be recorded in the minutes of the meeting. The quorum for a meeting of the Ethics Committee shall be verified whenever a decision is taken.

The Ethics Committee shall take its decision by a majority of more than half of the members voting. A person who would otherwise be disqualified under Chapter 3.2 of these Rules of Procedure shall not be entitled to vote on the statement.

Minutes of the meetings of the Ethics Committee shall be taken by the Compliance Officer and, in the absence of the Compliance Officer, by a member of the Ethics Committee present.

The minutes shall include:

- the place and time of the meeting of the Ethics Committee,
- the names of those present, and
- the main events, declarations and statements adopted at the meeting,
- the number of votes cast for and against, and
- list of those who abstained from voting or did not participate in the vote.

The minutes shall be drawn up in hard copy within 8 working days of the meeting. The minutes shall be certified by the Chief of the Ethics Committee and by the member elected by the Ethics Committee at the meeting. The minutes of the meetings of the Ethics Committee shall be kept for 3 years.

Providing a statements without holding a meeting

The Ethics Committee may adopt a statement without holding a meeting. Such a decision shall be initiated by the Chief of the Ethics Committee by means of a notification sent electronically (e-mail) to the members, together with all the documents necessary for the adoption of the draft statement, in addition to making it available to the members by electronic means (access to which shall be granted). The Chief of the Ethics Committee and the members shall refrain from transmitting, in their electronic communications, any personal data relating to the subject matter of the proceedings.

The members of the Ethics Committee shall be given at least three days from receipt of the draft to send their vote to the Chief of the Ethics Committee. A period exceeding fifteen days shall be granted only in duly justified cases. In the event that a member's vote is not received by the Chief of the Ethics Committee within the time limit, that member shall be deemed to have abstained from voting.

When a statement of the Ethics Committee is adopted without a meeting, the provisions of these Rules relating to quorums and voting shall apply, except that the decision-making procedure shall be valid if at least as many votes as would be required for a quorum to be present if a meeting were held are sent to the Chief of the Ethics Committee.

Any member of the Ethics Committee shall be entitled to request the Chief of the Ethics Committee to convene a meeting of the Ethics Committee. In such a case, a meeting of the Ethics Committee shall be mandatory.

Within three days of the expiry of the deadline for voting, or, if all the members entitled to vote have voted before that deadline, within three days of the date of receipt of the last vote, the Chief shall establish the result of the vote and shall inform the other members of the Ethics Committee within a further three days.

The Compliance Officer shall draw up minutes of the Ethics Committee's statement without holding a meeting within 8 working days of the results of the vote. The minutes shall record the main events of the proceedings, statements and statements adopted, the number of votes cast for and against, and the abstentions and abstentions from voting. The minutes shall be certified by the Chief of the Ethics Committee and by a member elected by the Ethics Committee. The minutes of the procedure for adopting the statement of the Ethics Committee without a meeting shall be kept for 3 years.

2.2 COMPLIANCE OFFICER

The Compliance Officer is responsible in particular for:

- if he is concerned by the statement to be adopted at the meeting, to participate in the Ethics Committee meeting in a consultative capacity;
- assisting the work of the Ethics Committee by carrying out the tasks necessary to clarify the facts, conducting ethics investigations, drafting and checking reports and draft recommendations to be adopted by the Committee, documenting the Committee's work, keeping documents and ensuring that deadlines for decisions are respected;
- participating in ethics procedures as provided for in these Rules of Procedure;
- to convene the Ethics Committee in accordance with 4.1.2 of these Rules; and
- taking the minutes of the Ethics Committee meeting when attending or drafting the minutes of the proceedings for a statement to be adopted without holding an Ethics Committee meeting.

3. COMMON RULES ON ETHICS PROCEDURES

3.1 PRINCIPLES OF THE ETHICS PROCEDURES

All participants to Ethics Proceedings shall act in accordance with the rules applicable to them and in accordance with the principles laid down in this Rules at all stages of the proceedings. The Ethics Procedures are designed to ensure the proper functioning of R4's ethical commitment. Findings made in the Ethics Procedures do not entitle the person(s) concerned to compensation or any other legally enforceable claim.

Co-operation: all participants in the procedure are obliged to co-operate with other participants. Under the principle of cooperation, the person requested to provide documents or information in the context of the Ethics Procedures must send the requested documents and information to the Compliance Officer within 5 working days of the request.

Fair and equitable process: all participants in the Ethics Procedures must act objectively, impartially and in good faith. All persons and entities involved in the conduct of the Ethics Procedures shall respect the privacy and personal data protection rights of the persons involved in the Ethics Procedures and shall enforce them at all stages of the Ethics Procedures.

Confidentiality principle: Personal data of all persons involved in the whistleblowing process must be kept confidential and may only be disclosed to employees other than the Compliance Officer investigating the whistleblowing, to the extent strictly necessary for the investigation of the whistleblowing and the conduct of the investigation.

The Compliance Officer investigating the report and the employees involved shall, until the investigation is closed or formal charges are initiated as a result of the investigation, keep confidential and shall not share information on the content of the report, the persons involved in the report, documents produced in the course of the procedure or made available in connection with it with any other department or employee of the employing organisation, except for the purpose of informing the person concerned by the report. The outcome of the whistleblowing procedure containing personal data shall be disclosed only to the decision-makers responsible for the decision and only to the extent necessary for the decision. The information generated in the course of the Ethics Committee's work is considered to be highly personal data, and the Ethics Committee may also process sensitive data in the course of its work.

Secrecy of data: whistleblowers and witnesses in ethics proceedings may request that their data be kept confidential in the case. In this case, only members of the Ethics Committee, other than the Compliance Officer, may know their names.

Principle of exclusivity: the Ethics Committee shall not initiate an Ethics Procedure in connection with a violation of law that is the subject of the Ethics Procedure until the final conclusion of any court or administrative proceedings initiated in connection with such violation, and shall suspend any proceedings already in progress..

3.2 EXCLUSION

A member of the Ethics Committee or a Compliance Officer who, for any reason, cannot be expected to give an impartial opinion on a particular matter or to participate impartially in an Ethics procedure shall not be entitled to conduct an investigation or to participate in the decision-making (or to provide a statement) in an Ethics procedure.

Impartial assessment of the case cannot be expected in particular from:

- a) the initiator of the Ethics procedure (who is the whistleblower in the case of an whistleblowing procedure), the person who committed the conduct on which the procedure is based;
- b) a relative or representative of such persons; or
- c) a person whose testimony is necessary for the Ethics procedure.

The Compliance Officer shall immediately inform the Chief of the Ethics Committee of any disqualification against him or her and the member of the Ethics Committee shall immediately inform the other members of the Ethics Committee of any disqualification against him or her. Furthermore, any participant in the procedure shall have the right to lodge an objection of bias.

The decision on exclusion shall be taken by the Chief of the Ethics Committee in the case of the Compliance Officer and by the other permanent members of the Ethics Committee as a body. The Chief of the Ethics Committee and the other members of the Ethics Committee shall state the reasons for their decision on exclusion.

In the event that the decision of the other members of the Ethics Committee does not lead the member of the Ethics Committee to give an unbiased opinion on the matter, the body shall take action through the Chief of the Ethics Committee to appoint an alternate. The Chief of the Ethics Committee may choose to appoint an alternate member of the Ethics Committee from among the employees of R4 or may decide to appoint 3 members from among the permanent members to conduct the proceedings. In the event that the reason for the exclusion is that the conduct on which the Ethics Procedure is based is committed by a member of the Ethics Committee, an extraordinary Ethics Committee shall be set up, the members of which shall be appointed by the CEO of 4iG Plc.

4. RULES FOR EACH ETHICS PROCEDURE

4.1 WHISTLEBLOWING PROCEDURE

The purpose of this chapter is to define the tasks and powers of the departments and persons involved in the procedure for reporting violations of the provisions of the Code of Ethics and the internal rules relating thereto (hereinafter referred to as the "**whistleblowing procedure**"), to lay down the principles and details of the procedure and to establish the rules of guarantee for the protection of whistleblowers.

These Rules are based on the provisions of the Codes of Ethics and the legislation applicable to the whistleblowing procedures, in particular Law XXV of 2023 on complaints, whistleblowing in the public interest and rules on whistleblowing, and on the core values represented by R4.

4.1.1 To initiate the whistleblowing procedure

The whistleblowing procedure may be initiated:

- a) by a whistleblowing report (including a report received and investigated by the Compliance Officer);
- b) on the basis of findings made by the Compliance Officer in his or her own authority; or
- c) based on findings made during internal audit or control processes at R4.

Reporting

The 4iG Group receives whistleblower reports under its two-tier whistleblowing system. Under this system, 4iG Plc is entitled to receive and investigate whistleblower reports from its member companies, including R4, in addition to those concerning its own activities. R4 is only entitled to receive and investigate notifications concerning it.

Under the whistleblowing system, anyone is entitled to file a report (hereinafter "**whistleblower**"), including, in particular, R4's officers, employees and persons under contract with R4, if they have information about suspected violations or conduct that violates R4's Code of Ethics and internal rules.

Detailed rules for reporting are set out in the Whistleblowing and Whistleblower Protection Policy.

Ethical misconduct detected by the Compliance Officer in his/her own authority

In the event that the Compliance Officer, acting in his or her own authority, detects a violation of the provisions of the Code of Ethics or related internal regulations, the Compliance Officer is entitled to initiate a whistleblowing procedure and to initiate an investigation under the Whistleblowing and Whistleblower Protection Policy.

Ethics misconduct detected during internal audit or control processes at R4

In the event of suspected ethical misconduct in an internal audit or control process at R4, the person or department responsible for the internal audit or control process shall have the right to initiate an ethics reporting procedure. In such a case, the person or department responsible for the internal audit or control process shall record in a report the nature and background of the ethical misconduct which gave rise to the initiation of the misconduct report, other relevant information necessary to assess the matter and the evidence supporting the allegation of ethical misconduct. The person or department responsible for the internal audit or control process shall forward the report to the Compliance Officer.

4.1.2 Procedure of the Ethics Committee

In the event that the Compliance Officer does not act within the scope of his or her authority in relation to a report, the Compliance Officer must convene a meeting of the Ethics Committee to initiate an investigation into the perceived misconduct. In addition, the Compliance Officer shall, with the agreement of the Group Compliance Manager, provide the Ethics Committee with the whistleblowing and all relevant information relating to it, as well as the draft statement to be adopted.

The Ethics Committee shall take a decision on the merits of the notification within the shortest time possible under the circumstances, but no later than 30 days from the date of receipt of the notification by the Compliance Officer. Except in the case of a notification from an anonymous or unidentified whistleblower, this time limit may be waived only in particularly duly justified cases and after informing the whistleblower at the same time. However, the duration of the investigation may not exceed three months in such cases.

The Ethics Committee may, at the end of the whistleblowing procedure, take one of the following statements:

- a) a finding that the conduct under investigation has been unlawful, in breach of the R4 Code of Ethics or of one or more of the provisions of R4's internal rules;
- b) the conduct which is the subject of the ethics procedure is not contrary to the law, the R4 Code of Ethics or one of the provisions of R4's internal rules;
- c) no violation of the provisions of the Code of Ethics or of any of R4's internal rules can be established, but the Ethics Committee detects misconduct that has the potential to violate R4's ethical values.

The Ethics Committee is entitled to initiate the following sanctions:

For employees:

- a) verbal warning
- b) written warnings
- c) termination of employment

In the case of contractual partners, modification or termination of the contractual relationship.

If the conduct described in the whistleblowing report is found to be in breach of the rules of the whistleblowing procedure, or in breach of the provisions of the Code of Ethics or related internal regulations, or of R4's ethical values, the Chief of the Ethics Committee is obliged to:

- a) In the case of an employee, to initiate a warning (written or verbal) or termination of employment of the reported employee with the person exercising the authority of the employer over the employee concerned, together with a written draft of the measure and the reasons on which it is based;
- b) in the case of contractual partners, to the contractor or his/her superior to terminate or modify the contract, at the same time as sending a written draft of the measure and the reasons for it.

If, based on the investigation, the conduct described in the report warrants the initiation of court or administrative proceedings, the Chief of the Ethics Committee shall, after consulting with the Group Security Director, immediately take steps to initiate such proceedings. If criminal charges appear to be justified, the report shall be made in consultation with the Security Director, as the body responsible for liaising with the authorities in criminal matters.

4.1.3 Follow-up of recommendations

Based on the decision of the Compliance Officer and the opinion of the Ethics Committee, the manager exercising employer's rights over the person concerned shall decide on the necessary further measures within 15 days at the latest. The person exercising employer's rights shall immediately notify the Compliance Officer of the measures taken. The Compliance Officer shall report on the measures taken to the Group Compliance Manager.

In the event that the Compliance Officer's decision and the Ethics Committee's statement propose measures that justify it (e.g. where the Ethics Committee recommends a change in business processes), a 30-day deadline may be set for a decision on the measures initiated.

4.1.4 Giving information

On the instructions of the Ethics Committee, the Compliance Officer shall inform the whistleblower and the persons concerned by the whistleblowing of the decision taken in the case and of any further action or procedure initiated on the basis of the decision.

4.1.5 Repeated/supplementary whistleblowing procedure

In the light of the Ethics Committee's statement, the whistleblower or the persons concerned by the whistleblowing may, within 5 days of being informed of the statement, request the Compliance Officer to continue the procedure, or to supplement the statement if they have relevant information not known during the procedure. The Ethics Committee will decide on the conduct of a repeat/supplementary whistleblowing procedure on the basis of the information provided by the Compliance Officer.

The rules applicable to the whistleblowing procedure shall apply mutatis mutandis to the repeat/supplementary whistleblowing procedure.

4.1.6 Provisions on personal data processing in the context of the whistleblowing procedure

Within the framework of the whistleblowing system, R4 is entitled to process personal data of the whistleblower and the person concerned by a report, including sensitive data and criminal personal data, solely for the purpose of investigating the report and remedying or stopping the conduct that is the subject of the report, and to transmit them to an external body involved in the investigation of the report.

If the investigation reveals that the report is unfounded, it shall be disregarded or no further action shall be taken, and the data relating to the report and the documents prepared during the investigation shall be deleted within 60 days of the completion of the investigation.

If measures are taken on the basis of the investigation, including legal proceedings or labor law measures against the whistleblower, the data relating to the report may be processed in the reporting system until the final conclusion of the proceedings initiated on the basis of the report.

After the deadline for the processing of personal data has expired, the Compliance Officer shall delete all data from the documents processed in the abuse reporting procedure (e.g., statements, declarations, other evidence, drafts, etc.) that could be used to directly or indirectly identify the data subject. R4 shall be entitled to retain the resulting documents that do not contain personal data for a period of 5 years from the final conclusion of the Ethics Committee procedure, disciplinary procedure, or court or administrative proceedings.

The details of the processing of data in the context of the whistleblowing procedure, in particular the legal basis for the processing, the purposes of the processing, the scope of the personal data processed, the recipients of the personal data processed and the rights of the data subjects, are set out in the privacy notice available on the R4 website.

The Ethics Committee's statements, in a form deprived of any data that could be used to identify the data subjects, are public.

4.2 CONSULTATION PROCEDURE

The purpose of this chapter is to define the roles and responsibilities of the departments and persons involved in the procedure for answering questions, interpreting the provisions and providing statements in relation to the provisions of the Codes of Ethics and related internal rules (hereinafter referred to as the "**consultation procedure**"), to lay down the principles and detailed rules of the procedure and to establish safeguards to protect the persons who raise questions.

4.2.1 The opening of the consultation procedure

The consultative procedure may be launched:

- (i) by a question submitted by an employee of R4 or a person having a contractual relationship with R4; or
- (ii) on the basis of a doubt raised by the Ethics Committee or the Compliance Officer in the exercise of his or her authority in relation to the interpretation of the provisions of the Code of Ethics or the internal rules relating to it.

Question

Within the framework of the consultative process established by R4, any employee of R4 or any person under contract with R4 (collectively, " **questioner** ") may ask a question in connection with the interpretation of the Code of Ethics or related internal regulations.

Questions, by whatever channel, should be forwarded to the Compliance Officer, who will inform the questioner, together with a copy of these Rules of Procedure, of the procedure in a documented form, including

- (i) the procedural rules governing the answer to the question; and
- (ii) the rules governing the processing of the questioner's personal data.

To start the consultation procedure, the questioner must provide the following information and make the following declarations:

- the name, telephone number or e-mail address (if any) of the questioner;
- a question related to the interpretation of a provision contained in the Code of Ethics or related internal rules;
- a statement by the questioner that the question is being put in good faith.

A doubt raised by the Ethics Committee or the Compliance Officer in the context of the interpretation of a provision of the Code of Ethics or related internal rules, in the exercise of his or her discretion

In the event that the Ethics Committee or the Compliance Officer, acting in his or her authority, detects a discrepancy, deficiency or confusion in the interpretation of the provisions of the Code of Ethics or related internal rules, the Ethics Committee or the Compliance Officer (with the agreement of the Group Compliance Manager) shall be entitled to initiate a consultative procedure and the Ethics Committee shall be entitled to provide statements in accordance with Chapter 4.2.2 of the Code.

4.2.2 Answering the question

In cases where the question can only be answered on the basis of the provisions set out in the Code of Ethics or related internal rules (simple discretionary questions), the Compliance Officer is entitled to answer the question after having sought the opinion of the Group Compliance Manager.

In the event that the Compliance Officer considers that the question may require a statement to be taken in order to assist in the interpretation of the provisions of the Code of Ethics or related internal rules, the Compliance Officer shall request the Chief of the Ethics Committee to convene a meeting of the Ethics Committee or to provide statement without holding a meeting. At the same time, the Compliance Officer shall make the issue and the draft statement to be developed by the Ethics Committee available to the Ethics Committee. The Ethics Committee shall adopt a statement on the matter within 30 days of receipt of the question.

In the event that the Compliance Officer considers that the request submitted as a question is concerning any member of the Ethics Committee due to the contents of the request, the Compliance Officer and the Chief of the Ethics Committee shall immediately take steps to initiate this procedure in accordance with Section 4.1.1 of the Code.

4.2.3 Information, disclosure

Information

The Compliance Officer, acting on his/her own authority or as instructed by the Chief of the Ethics Committee, shall inform the person making the request of the decision in the case and of any further action or proceedings initiated on the basis of the decision.

Disclosure

The Chief of the Ethics Committee shall publish any statements that are significant for the interpretation of the provisions of the Code of Ethics and related internal regulations on the Ethics and Compliance website, without disclosing any information that could identify the persons involved, and shall inform the Board of Directors and the CEO thereof. The Compliance Officer shall initiate the clarification or supplementation of the relevant Policy or Regulation as necessary.

5. ANNEXES

Annex number	Annex Title
1. Annex number	INVITATION TO THE ETHICS COMMITTEE

1. Annex No 1

**INVITATION TO THE ETHICS COMMITTEE
TO PARTICIPATE IN THE WORK OF THE ETHICS COMMITTEE**

Dear!

We hereby request you to accept our invitation to participate in the work of the Group Ethics Committee on behalf of (company name) in accordance with the Rules of Procedure for the Ethics Committee (COM6_R4). Please state within 8 days of receipt of this request whether you accept the invitation.

If you are unable to attend, please appoint another participant in accordance with the Rules of Procedure for the Ethics Committee.

Thank you in advance for your work.

..... (name of place), (year) (month) ... day

.....

(...)